

### **REMARKS/ARGUMENTS**

The claims have been amended to overcome the 35 USC 112 rejections. The only outstanding rejection is that the meaning of "next bleaching stage" is not clear. As is known in the industry, a pulp bleach plant has a number of oxidative and extraction stages. These are in sequence. According to the American Heritage College Dictionary, "next" means "immediately following ... in sequence". In claim 1, the "next bleach stage" would be the bleach stage immediately following the addition of the various chemicals.

All of the claims have been rejected over Jewell et al 6,379,494. Jewell discloses "a general laboratory method" for practicing the reaction. Jewell et al does not describe how this general laboratory method would be incorporated into a pulp mill process. Jewell et al does not describe how this general laboratory method would be incorporated into a pulp mill bleaching process. Jewell et al does not disclose how this general laboratory method would be installed between stages of a pulp mill bleaching process.

The simple and expensive answer to translating a laboratory process to a mill process would have been to add the process to the end of the pulp mill process.

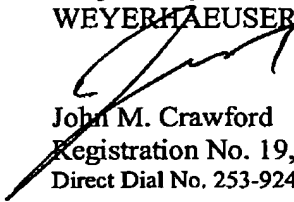
The actual problem to be solved was how to take a general laboratory method and place it within the confines of an existing pulp mill. This was a more difficult problem. It was not a routine problem. Some of the inventors on the reference are also inventors on this application. It should be noted that four and a half years elapsed between the filing the earlier application and the filing of this application. Years elapsed between the general laboratory method and the pulp mill solution.

The claims are directed to the solution of placing the process within the confines of the mill, of placing the process between stages of a bleach plant. This is not disclosed in Jewell et al.

**CONCLUSION**

Reconsideration and allowance of the claims is respectfully requested.

Respectfully submitted,  
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